



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CPK
F. #2016R01831

*610 Federal Plaza
Central Islip, New York 11722*

August 31, 2022

By ECF

Honorable Joan M. Azrack
United States District Judge
United States Courthouse
920 Federal Plaza
Central Islip, New York 11722

Re: United States v. Nader Mohamad Farhat, et. al.
Criminal Docket No. 18-292 (JMA)

Dear Judge Azrack:

The undersigned Assistant United States Attorneys write to advise the Court of a document docketed yesterday in the consolidated cases of U.S. v. Nader Mohammad Farhat ("Farhat"), Case Nos. 17-20865 and 22-20339 in the United States District Court for the Southern District of Florida ("Farhat SDFL"). Farhat was previously a defendant in the above-referenced case ("Farhat EDNY") until its transfer by agreement of the parties on July 22, 2022.

Defendants had filed a motion for severance in the companion case to Farhat EDNY, U.S. v. Khwaja, CR 18-607 ("Khwaja Case"). This Court denied that motion earlier this month ("Motion to sever denied. Opinion to issue." Dk. 341, Khwaja Case). At the conference at which the severance motion was denied, the government advised the Court that a plea by Farhat was imminent and that plea took place last week. As part of that plea, Farhat agreed to a Factual Proffer. In connection with the Severance Opinion, the United States attaches that Factual Proffer entered into by Farhat at his plea last week which states, in sum, that Farhat transferred large sums of money, at least \$20 million, in third-party wires through multiple shell companies in the U.S. from South America to hide the true origin of the funds to ISK and Tronix, companies of defendants Abdul Rahman Khwaja and Enayatullah Khwaja, respectively. This Factual Proffer, part of Farhat's plea documents in Farhat SDFL, confirms the statement of the United States in its opposition to the motion for severance that "One set of companies involved in sending illegal monetary proceeds between South America and the United States for the Farhat MLO were the companies owned and operated by the Khwaja family. In furtherance of the international money laundering operation, E. Khwaja and A. Khwaja used companies that they owned and operated – including, but not limited to, National Electronics, Inc. ("National"), Ishan International, Inc. ("Ishan"), Solid Electronics, Solid Wireless Inc. ("Solid Wireless"), ISK Corporation ("ISK") and Tronix Telecom ("Tronix") (collectively, the "Khwaja Companies") –

as a primary conduit by the Farhat MLO to transfer tens of millions of dollars between the United States, Paraguay and other countries.” (Khwaja Case, Dk. 256 at 4).

Respectfully submitted,

BREON PEACE
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